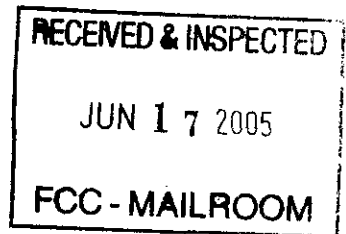


**Before the
Federal Communications Commission
Washington, D.C. 20554**



**In the matter of
Amendment of 73.202
Table of Allotments
FM Broadcast Stations**

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To: John A. Karousos
Assistant Chief, Audio Division
Office of Broadcast License Policy
Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Northwest Indy Media respectfully petitions the FCC to institute a rule making proceeding to amend the FM Table of Allotments to add Channel 249A at Darrington, Washington as its First Local Service.

This allocation would affect a proposed Minor Change for KFMY, Raymond, Washington in FCC application BPH-20050511ADR. We ask that the Darrington application be considered as a counter proposal to the KFMY application.

DISCUSSION

Petitioner respectfully submits that the public interest and convenience would be served by allocating Channel 249A to Darrington, Washington as the community's first local radio service.

Because this allocation is within 320 km of the Canadian border, and because it would be short spaced to co-channel station CBUF-FM in Vancouver, British Columbia, we ask that the commission seek the concurrence of the Canadian Government in making this allotment. We note that the proposed allocation would cause no prohibited interference with co-channel CBUF-FM on Canadian soil.

Darrington, Washington is a town incorporated by the state of Washington, with a population of 1,405 people, according to the April 1, 2004 estimate published by the State of Washington.

Darrington is governed by a Mayor/Council form of government and has its own town hall.

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Darrington has a city library which is affiliated with the Snohomish County library system.

Public school students are educated by the three schools of Darrington School District #330. Darrington High School has 205 students and 18 full time teachers.

Community organizations and services include the Darrington Food Bank, the Cascade Senior Center, the Darrington Community Center and the Darrington Family Support and Resource Center.

Several churches serve Darrington, including the Glad Tidings Church of God, the Mountain View Baptist Church, the Church of God of Prophecy, The Church of Jesus Christ of the Latter Day Saints, Darrington United Methodist Church, The Kingdom Hall of Jehovah's Witnesses and The Episcopal Church of Western Washington.

Darrington has its own post office and ZIP code, 98241. Darrington is the default city for this ZIP code, and is the only city listed for the 98241 ZIP code at the USPS.com website.

Darrington had 732 establishments registered to collect sales tax for the State of Washington in 2004. Total 2004 sales taxable revenue from Darrington businesses was \$9,024,011.

To prevent short spacing with KBSG, Channel 247C, Tacoma, WA; KING, Channel 251C, Seattle, WA; and with KYSN, Channel C3, East Wenatchee, WA; a transmitter site of 8 km north of Darrington city center is requested. While the terrain is rugged, there are viable transmitter sites throughout the area that will provide 70 dBu coverage to the City of License with both Line of Sight and Fresnel Zone clearance.

Exhibit 1 is an engineering study showing that channel 249A could be allocated to Darrington, Washington, consistent with the FCC's Domestic FM separation rules.

Exhibit 2 shows the City Grade Contour over the City of License from the proposed allocation site.

The assignment of Channel 249A to Darrington, WA would bring First Local Service to a city of 1,405 people. The assignment of 249C to Oakville, WA would bring First Local Service to 675 people. Both population figures are based on Washington State estimates as of April 1, 2004.

Clearly, a larger number of people would receive First Local Service from assignment of Channel 249A to Darrington, WA than Channel 249C to Oakville, WA.

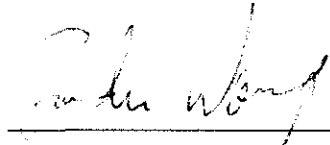
Since the grant of the KFMY upgrade to Class C operation would preclude the assignment of this channel to Darrington, we ask that the KFMY application be either disallowed or modified to permit a Class A assignment at Darrington.

Should the commission grant this petition, the petitioner will apply for the channel and construct a new facility in a timely manner.

Exhibit 1 – Proposed Distance Separation Map
Exhibit 2 - Proposed City Grade Coverage Map

I certify that the factual information provided in this Petition for Rule Making is correct and true to the best of my knowledge.

Respectfully submitted,



Dr. Sandra Woodruff
2708 Hampton Ct. SE
Olympia, WA 98501

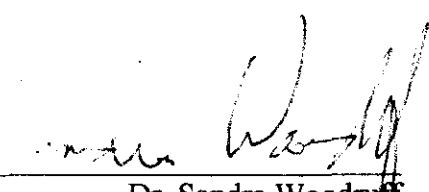
June 16, 2005

CERTIFICATE OF SERVICE

I, Dr. Sandra Woodruff, hereby certify that on this date, June 16, 2005, I caused to be served upon the parties listed below by first class mail, postage prepaid, copies of the foregoing Petition for Rulemaking.

Mr. Gregory J. Smith
South Sound Broadcasters, LLC
13612 NE 37th Place
Bellevue, WA 98005-1418

J. Dominic Monahan, Esq.
Luvaas, Cobb, Richards & Fraser, PC
777 High Street – Suite 300
Eugene, OR 94701



Dr. Sandra Woodruff
2708 Hampton Court SE
Olympia, WA 98501

Exhibit 1 - 73.287 Analysis

Dr. Sandra Woodruff - Engineering Consultant

Job: WA Darrington 249A.fmi

Master Database: 2005_Jun_16.fmd

Lat: N48:19.29 Lon: W121:36.87 NAD-27

Scale: 1:500000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 22 km, Clearance: FCC

Comments: No Comments

Description: Darrington Wa Channel 249 A Separation from nearby domestic stations

rfInvestigator-FM Version 2.1.14

by rfSoftware, Inc.

Date: 6/16/2005 3:52:18 PM

Key:

Short

Close

Clear

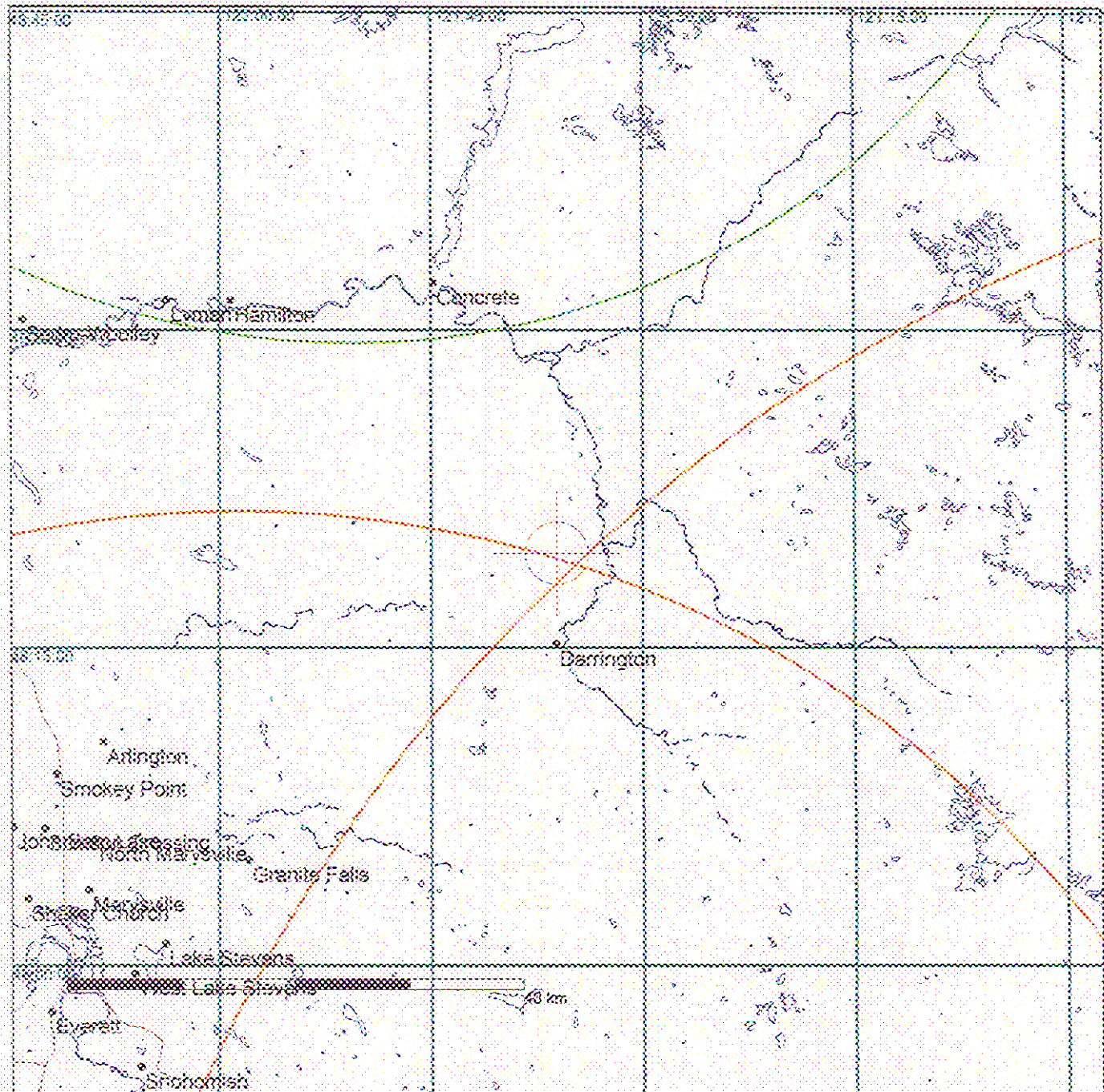


Exhibit 2 - 70 dBu Contour Analysis

Dr. Sandra Woodruff - Engineering Consultant

Job: WA Darrington 249A.fny

Master Database: 2005_Jun_16.fnd

Lat: N48°19'29" Lon: W121°36'07" NAD-27

Scale: 1:500000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 22 km, Clearance: FCC

Comments: No Comments

Description: Darrington WA Channel 249A City Grade Coverage

rfInvestigator-FM Version 2.1.14

by rfSoftware, Inc.

Date: 6/16/2005 4:30:13 PM

Key:

City Grade

Protected

Co-Channel

1st Adj

2nd/3rd Adj

